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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DISCOVERY
DEADLINES**

Judge: Honorable Lucy H. Koh

1 Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, the Court issued a Case Management Order on September 3, 2021 that set
4 discovery deadlines for the case, including an August 2, 2021 fact discovery cutoff (Dkt. 61), and

5 WHEREAS, pursuant to a request by the parties in their May 19, 2021 Joint Case
6 Management Statement (Dkt. 169), the Court issued a Case Management Order extending the
7 discovery deadlines, including an extension of the fact discovery cutoff until November 2, 2021,
8 and

9 WHEREAS, following the parties’ August 12, 2021 discovery hearing, the Court issued an
10 Order requiring the parties to submit a proposed stipulation for an extension of the fact discovery
11 cutoff to January 21, 2022 and other schedule adjustments as necessary (Dkt. 242), and

12 WHEREAS, the parties believe that the other discovery deadlines should be extended
13 commensurate with the extension to the fact discovery cutoff, and

14 WHEREAS, the parties agree to work together in good faith to resolve any discovery dispute
15 that arises in connection with briefing class certification, including through additional fact discovery
16 if necessary, and to raise any dispute with the Court.

17 NOW THEREFORE, the Parties stipulate to the following revised discovery schedule.

- 18 1. The deadline for the close of fact discovery is extended from November 2, 2021 to
19 January 21, 2022.
- 20 2. The deadline for opening expert reports is extended from November 23, 2021 to
21 February 11, 2022.
- 22 3. The deadline for rebuttal expert reports is extended from December 17, 2021 to March
23 24, 2022.
- 24 4. The deadline for the close of expert discovery is extended from February 7, 2022 to May
25 19, 2022.
- 26 5. The last day to file a motion for class certification is extended from February 14, 2022
27 to May 26, 2022. Any opposition shall be due July 14, 2022, and any reply shall be due
28 August 11, 2022.

1 DATED: August 24, 2021

SUSMAN GODFREY LLP

2
3 By /s/ Amanda Bonn

Amanda Bonn

4 *Counsel on behalf of Plaintiffs*

5 DATED: August 24, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

6
7 By /s/ Andrew H. Schapiro

Andrew H. Schapiro

8 *Counsel on behalf of Google*

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Joint Stipulation And [Proposed] Order to Continue Discovery Deadlines. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: August 24, 2021

By /s/ Amanda Bonn

Amanda Bonn

Counsel on behalf of Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
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Case No. 5:20-cv-03664-LHK-SVK

[PROPOSED] ORDER

Judge: Honorable Lucy H. Koh

Pursuant to stipulation of the Parties, the Court sets the following case schedule:

Scheduled Event	Current Date	New Date
Close of Fact Discovery	November 2, 2021	January 21, 2022
Opening Expert Reports	November 23, 2021	February 11, 2022
Rebuttal Expert Reports	December 17, 2021	March 24, 2022
Close of Expert Discovery	February 7, 2022	May 19, 2022
Last Day to File Motion for Class Certification	Mot.: February 14, 2022 Opp'n: March 28, 2022 Reply: April 25, 2022	Mot.: May 26, 2022 Opp'n: July 14, 2022 Reply: August 11, 2022
Class Certification Hearing	May 19, 2022	TBD

IT IS SO ORDERED.

DATED: _____, 2021

Hon. Lucy H. Koh
United States District Judge